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8  
9 **UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

10 MJL 12, LLC, a Nevada limited liability  
11 Company,

12 Plaintiff,

13 vs.

14 MJJ PRODUCTIONS, LLC, a California  
15 limited liability company; MJ PUBLISHING  
16 TRUST d/b/a MIJAC MUSIC; TRIUMPH  
17 INTERNATIONAL, INC., a California  
18 corporation; and TRIUMPH  
INTERNATIONAL, LLC, a California limited  
liability company,

19 Defendants.

Case No. 2:24-cv-00122-GMN-EJY

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME TO  
RESPOND TO MOTION TO DISMISS**

(First Request)

20 Pursuant to Federal Rule of Civil Procedure 6 and Local Rule IA 6-1, the parties, by and  
21 through their undersigned counsel of record, hereby agree and stipulate to extend the time for  
22 Plaintiff MJL 12, LLC (“Plaintiff” or “MJ Live”) to file and serve its response to Defendant  
23 Triumph International, LLC’s (“Triumph’s”) Motion to Dismiss Sixth and Seventh Claims of the  
24 First Amended Complaint Pursuant to Fed. R. Civ. P. 12(b)(6), and Second Claim of the First  
25 Amended Complaint Pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6) (ECF No. 29) (the “Second  
26 Motion to Dismiss”), filed on June 14, 2024. This stipulation is made with reference to the  
27 following facts:

28 1. Plaintiff filed its Complaint for Declaratory and Other Relief on January 17, 2024.

1 (ECF No. 1.) On February 26, 2024, Plaintiff sent Defendants a request to waive formal service of  
2 the Summons and Complaint. (ECF No. 7.) Defendants executed the waiver on March 11, 2024.  
3 (*Ibid.*) As a result, Defendants' answer or other response to the Complaint was due on April 26,  
4 2024. (*Ibid.*) On March 20, 2024, Plaintiff voluntarily dismissed all Defendants, other than  
5 Triumph, without prejudice. (ECF No. 6.)

6 2. On April 26, 2024, Triumph filed Defendant Triumph International, LLC's Special  
7 Motion to Dismiss Plaintiff's Seventh Claim Pursuant to Nevada Anti-SLAPP Statute; and Motion  
8 to Dismiss Sixth and Seventh Claims Pursuant to Fed. R. Civ. P. 12(b)(6) and Second Claim  
9 Pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6) (ECF No. 13) (the "Original Motion to  
10 Dismiss"). The Original Motion to Dismiss sought to dismiss Plaintiff's seventh claim for relief  
11 pursuant to Nevada's Anti-SLAPP statute and Plaintiff's sixth and seventh claims pursuant to Rule  
12 12(b)(1) and/or 12(b)(6) of the Federal Rules of Civil Procedure.

13 3. On May 17, 2024, Plaintiff dismissed its seventh claim for relief without prejudice,  
14 filed a First Amended Complaint, and filed a response to the Original Motion to Dismiss. (ECF  
15 Nos. 24, 25, 26.)

16 4. On May 24, 2024, the parties submitted their Stipulation and Proposed Order  
17 Withdrawing Anti-SLAPP Motion and Motion to Dismiss [ECF 13] as Moot; and Extending Time  
18 to Respond to Plaintiff's First Amended Complaint. (ECF No. 27.) The stipulation gave Triumph  
19 a 14-day extension of time to file and serve its response to Plaintiff's First Amended Complaint,  
20 from May 31, 2024, to June 14, 2024. (*Id.* ¶ 5.) It also provides as follows: "[I]f Plaintiff needs  
21 additional time to respond to Triumph's response to the First Amended Complaint, Triumph will  
22 accommodate Plaintiff's reasonable request." (*Id.*) The Court granted the parties' stipulation.  
23 (ECF No. 28.)

24 5. To accommodate Plaintiff's counsels' schedule, the parties have agreed to extend  
25 the date for Plaintiff to file and serve its response to the Second Motion to Dismiss from June 28,  
26 2024, to July 12, 2024.

27 6. In addition to accommodate Triumph's counsels' schedule, the parties have agreed  
28 to extend the date for Triumph to file and serve its reply brief from July 19, 2024, to July 26,

2024.

7. This is the first request for an extension of time for Plaintiff to respond to the Second Motion to Dismiss and for Triumph to file its reply brief.

**IT IS SO STIPULATED.**

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**IT IS SO ORDERED:**

  
UNITED STATES DISTRICT JUDGE

DATED: June 26, 2024